

Chairman of the Board
DALE LAWS
*Vice President, Manufacturing Operations,
Laundry and Dishwashers, Whirlpool Corporation*

President
RYAN AUGSBURGER



July 6, 2021

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail Code 1101A
Washington, DC 20460

**Re: Notice of Proposed Rulemaking, Phasedown of Hydrofluorocarbons
Docket ID No. EPA-HQ-OAR-2021-0044**

Dear Administrator Regan,

The Ohio Manufacturers' Association (OMA) is writing in opposition to the Environmental Protection Agency's (EPA) proposed rulemaking, Phasedown of Hydrofluorocarbons Docket ID No. EPA-HQ-OAR-2021-0044. The OMA represents over 1,300 manufacturers in every industry throughout Ohio and is dedicated to protecting and growing manufacturing in Ohio. For more than 100 years, the OMA has supported reasonable, necessary, and transparent environmental regulations that promote the health and well-being of Ohio's citizens. Regrettably, the EPA's proposed rule to implement the American Innovation and Manufacturing (AIM) Act includes an unnecessary and unwarranted ban on non-refillable cylinders.

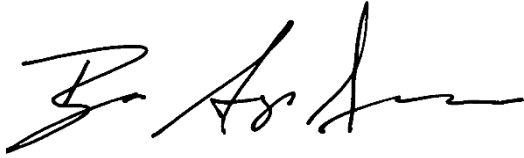
In terms of federal standards, this proposed rule enters new territory that exceeds the charge given to EPA by Congress in the AIM Act. Initial discussions addressing HFCs reflected a bipartisan consensus. Using rulemaking to remove the last American manufacturer serving this industry is not only legally questionable but will inevitably lead to more cheating and unfair practices (and more environmental damage) by Chinese manufacturers.

The economic impact of this ban is unreasonable and extremely detrimental to Ohio's economy. As the representative of Ohio's leading industry sector which employs more than 700,000 Ohioans, the OMA knows firsthand how the rules and regulations that govern this industry impact livelihoods and our communities. If cylinders produced by Ohio employees are banned without debate, without discussion, without demonstrated environmental benefit, and without Congressional authorization -- it calls into question the willingness to partner with Ohio manufacturers for environmental progress in Ohio.

There is no reason that this issue cannot be addressed in a way that preserves this industry and the American jobs it supports. Ultimately, this proposal to eliminate non-refillable cylinder production in the United States seems premature, without demonstrated basis, beyond the EPA's scope, and detrimental to Ohio manufacturing.

The OMA thanks EPA and appreciates the opportunity to comment on the proposed rulemaking.

Respectfully,

A handwritten signature in black ink, appearing to read "Ryan Augsburger". The signature is fluid and cursive, with a large initial "R" and "A".

Ryan Augsburger
President
The Ohio Manufacturers' Association